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Before the
Federal Communications Commissio
Washington D.C. 20554

In the Matter of)
)
Review of the Commission's) MM Docket No. 93-114
Rules Governing the Low)
Power Television Service)

To: The Commission --Mail Stop 1170

COMMENTS FROM JOHN H. BATTISON P.E. & ASSOCIATES

The following comments are offered in response to the Commission's Proposed Rule Making RM-7772:

1) Substantial experience and guidance in the preparation and handling of LPTV applications have developed since the first LPTV application was filed. Many applicants have been dismissed because of minor errors that did not warrant dismissal, but no option existed.

In particular the ability to avoid the lengthy delay caused by a lottery, by use of an appropriate technical change would work to the advantage of all applicants, as well as easing the work load of the Commission's Staff.

This respondent is firmly in favor of the abandonment of the "Letter Perfect" application requirement, and the substitution of a single opportunity to make corrections, including coverage area changes to avoid a lottery.

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2) Expanded Use of Terrain Shielding

Inasmuch as the Commission now allows the demonstration of terrain shielding as means of perfecting an application against existing LPTV stations, there appears to be no justifiable objection to its use to protect against potential interference in the case of new applications. Once again, such a protocol would reduce the number of potential lotteries. It is strongly supported by this respondent.

3) Relaxed Definition of a Minor Change

Relaxation of the Minor Change Rule is long overdue. There are countless cases where LPTV service could be improved by a minor change in location-or even directional pattern- but because of a coincidental increase in coverage outside the existing 74 dBu contour of a directional station, a Major Change application has to be filed. The use of a circle of authorized 74 dBu radius as a "fence" would obviate the need to wait many months for a "window" to open, and the associated lengthy delay. The provision of "cut-off" on the day of filing would prevent antagonist filings that could introduce delays and possible lotteries. This respondent favors such a change.

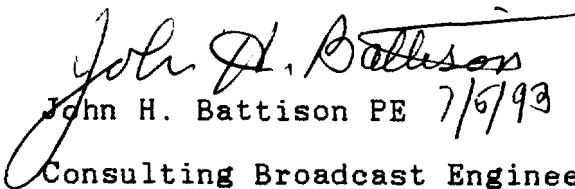
4) Four Letter Call Signs

It is considered that requiring an "LP" designator in a new four letter call sign would undo the good that the four letter call would generate. It should be possible for LPTV stations that truly operate as a television station and not as a repeater of mainly "off-satellite" material with no local programming to receive parity with their "big brothers", and be known by a similar four letter call.

5) Although the Proposed Rule Making did not include the use of higher power transmitters it is respectfully requested that consideration be given to the use of transmitters of more than nominal power to allow for line losses incurred in lengthy transmission line runs.

It is also respectfully pointed out that the name "Local Power Television Service" would be very suitable to replace "Low Power Television". It designates the intended nature of the service and implies the local dedication.

Respectfully submitted,


John H. Battison PE 7/6/93

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